

Michael Kind, Esq.
Nevada Bar No.: 13903
KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148
Phone: (800) 400-6808 x7
FAX: (800) 520-5523
mkind@kazlg.com

David H. Krieger, Esq.
Nevada Bar No.: 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com
Attorneys for Plaintiff Donald R. Robinson

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Donald R. Robinson,

Plaintiff,

v.

Great Plains Lending, LLC,
Synchrony Lending, Inc., and
Trans Union LLC,

Defendants.

Case No.: 2:18-cv-01763-JAD-NJK

**Stipulation for an extension of time
for Plaintiff to Respond to
Defendant's Motion to Dismiss [ECF
No. 18]**

(First Request)

Donald R. Robinson ("Plaintiff") and Synchrony Lending, Inc. ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **January 8, 2019**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Complaint, filed on November 27, 2018, ECF No. 18. Plaintiff's Response is currently due on

December 11, 2018.

Plaintiff filed his Complaint on September 11, 2018. ECF No. 1. Defendant filed its motion to dismiss on November 27, 2018. ECF No. 18. The parties are actively discussing the merits and possible resolution of the case and, in good faith and not for the purposes of delay, Plaintiff has requested and Defendant has agreed to allow Plaintiff an additional 30 days to respond to the Motion. Plaintiff requests additional time because of the upcoming holidays. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the Motion. This is the first request for an extension of this deadline.

The Parties therefore stipulate that Plaintiff's response to Defendant's motion to dismiss, ECF. No. 18, shall be due on or before **January 8, 2019**.

DATED this 10th day of December 2018.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind, Esq.
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148
Attorneys for Plaintiff

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ J Christopher Jorgensen
J Christopher Jorgensen, Esq.
Matthew Ryan Tsai, Esq.
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Attorneys for Defendant Synchrony Lending, Inc.

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: December 11, 2018.